

?????? ?? ?????????? (????? ????)

?? 26?? ??????? 2012 (\*)

«?? — ????? 2006/112/?? — ?????????? — ????? 151, ?????????? 1, ?????????? ?? —  
??????? ?????? ?????? ??? ?????????? ?????? ???, ? ????? ?????????????????? ???  
????? ?????? ?????»

???? ?????? C225/11,

? ?????????? ?????? ?????????????? ?????? ?????? 267 ????, ???  
?????? ?? Upper Tribunal (Tax and Chancery Chamber) (?????? ??????) ?? ??????? ??  
9?? ????? 2011, ? ????? ?????? ??? ?????????? ??? 13 ????? 2011, ??? ?????? ???  
?????

**The Commissioners for Her Majesty's Revenue and Customs**

????

**Able UK Ltd,**

? ?????????? (????? ????),

????????? ??? ??? A. Prechal (?????????), ?????? ???????, K. Schiemann ??? L. Bay  
Larsen, ???????,

????????? ??????????: P. Mengozzi

?????????: A. Calot Escobar

????????? ??? ?????? ??? ?????? ????????????,

????????? ??? ?????? ??? ?????????????? ??? ????????:

– ? ?????????? ??? ??????? ??????????, ?????????????? ??? ??? L. Seeboruth,

– ? ?????????? ????????, ?????????????? ??? ??? M. Szpunar,

– ? ?????????? ????????, ?????????????? ??? ??? R. Lyal ??? ??? C. Soulay,

?????? ??? ?????????? ??? ?????, ??? ?????? ??? ?????? ??????????????, ?? ?????????? ???  
?????? ??? ?????? ?????????? ????????,

?????? ??? ????????

??????

1 ? ?????? ?????????????? ?????????? ?????? ??? ?????????? ??? ?????? 151, ??????????  
1, ??????? ??, ??? ?????? 2006/112/?? ??? ??????????, ??? 28?? ?????? 2006,  
?????? ?? ?? ?????? ?????? ?????? ?????? ?????????????? ?????? (?? L 347, ?. 1, ??? ????: ??????  
?? ?? ???).).

2      ? ??????? ???: ?????????????? ??? ??????? ?????????? ?????? ??? Commissioners for Her  
Majesty's Revenue and Customs (??? ???: Commissioners) ??? ???: Able UK Ltd (??? ???:  
Able), ?? ?????????????? ??? ?????????????? ??? ?????????????????? ??? (??? ???: ???) ???  
?????????? ?????????? ?????????? ?????? ??? ?????????? ?????????? ?????????? ??? ???:

?? ?????? ?? ??????

?? ??????? ???

3      ?????????????????? ??????? ?????????????? ??? ?????????????? (????????? ??????????  
??? ?????????) ??? 4 ??????? 1949.

4      ?? ????? VIII, ?????? 1, ??? ??????????? ?? ???? ?????? ?????????? ?? ???? ??????  
?????? ??????????? ?? ??????? ?? ???? ?????? ??????? ?? ?? ??????????????? ?? ??????,  
?? ?????? ??????????? ?? ???? ?????? ??? 28 ?????????? 1952 (??? ????: ?????????? ?? ?? ??  
?????? ??????????? ?? ??????), ??????? ?? ???:

«???? ??????????? ???? ????????, ??? ???????????, ??? ??????????? ??? ??? ???????????  
???? ??????? ??????????? ???????????, ?? ?????? ??? ??????????? ???????????????, ??? ????  
??? ???????, ??? ??? ??? ??????? ??? ??????????? ?? ??????? ??? ??????? ???????????????  
???? ?? ??????? ??? ??????? ??????? ??? ??????? ??? ??????? ??? ??????????????? ??? ??? ???????, ???  
?? ??? ??? ??????? ??????????? ??????????? ??? ??????????? ?? ??????????????? ??? ?? ??? ???????  
????????? ??? ??????????? ??? ??????? ??? ??????? ??????????? ??? ??????????? ??? ???????»

?? ?????? ?? ??????

5      ?? ?????? 151, ??????????? 1, ??? ??????? ??? ??? ??? ?????? ?? ???;

«?? ?????? ????. ?????????????? ???. ???????????. ???????;

[...]

?) ??? ?????????? ??? ?????? ??? ??? ?????? ?????????? ?????????? ??? ?????????????????? ???  
????? ??? ?????? ??? ?????????? ??? ?????????????? ??? ?????? ??? ?????????? ??? ??? ??? ??????  
????????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ? ???  
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????  
????, ?????? ?? ?????? ?????? ?????? ?????? ?????? ??????.

[...].».

? ??????? ?? ?????? ?????? ?? ?? ?????????????? ?? ??????

6      ??? ??? ??????? ??? ?????????? ?????????? ??? ? Able ?????? ?????? ?? ?? United States Department of Transportation Maritime Administration (????????? ?????????? ???)

???????????? ???? ??????? ?? ??????? ?????????? ??? ???????) ??? ?? ??????? ?????????? ?????? ???, ???  
?????? ??? ??? ?? ??????? ?????????? ??? ??????? ??? ??????? ?????? ??? ???, ???  
????????? ??? ?????????? ??? ??????? ??? ??????? ??? ?????????? ?????????? ??? ??? ??????  
James, ??? Virginia (????????? ?????????? ??? ???????). ? ??????? ?????????? ??? ??? ?????.  
??????, ?? ?????? ?? ?????? ?? ?????????????? ??? ??????? ??? ?????????? ??? ?????????? ?? ??????????????  
??? ??? ?????????? ?????????? ??? ??????? ??? ??????? ?????????? ??????????, ??? ???  
?????? ?????????? ??? ?????????? ??? ??????? ??? ?????????? ??? Able ??? Teesside  
(????????? ?????????), ?????????? ?? ?????????? ?????????? ?????????????? ??? ???  
????????? ??? ?????????? ?????????? ??? ??????? ??? ?????? ?????????? ??? ??? ??????? ??  
????????? ??? ?????????? ??? ??????????.

7 ? Able ??????, ?? ?????? ??? 27?? ??????? 2008, ??? ??? Commissioners ??  
????????? ?? ??? ?? ???????????, ??? ??????? ???, ??? ??????? ?????????? ??? ???  
???????. ? Able ?????????? ??? ?? ?????????? ??? ?????????????? ??????? ??? ?????? 15,  
????????? 10, ??? ???????????, ??? ????? ??????? 77/388/??? ??? ???????????, ??? 17??  
????? 1977, ??? ?????????????? ??? ?????????? ??? ??????? ???, ??? ?????????? ?? ???  
????? ?????? ?????? — ????? ?????? ????? ?????????????? ?????: ??????????  
????????? ??? (?? ????. ??? 09/001, ?. 49), ?? ?????? ??? ?? ?? ?????? ??????????????  
?? ?? ??? 151, ?????????? 1, ??????? ??, ??? ??????? ??? ??? ???.

8 ??? 15 ??????? 2008 ?? Commissioners ??????? ??????? ??????? ?? ??? ??? ?????? ??  
????????? ?????????? ??? ??? ??????? ? Able ?????????? ??? ??????? ??????????  
???. ??? 21 ??????? 2008 ? Able ?????? ?? ?????????? ? ?????? ????. ??????????  
?? ? Commissioners ?????????? ??? ?????? ??? ?????? ??? 18 ??????? 2008, ?  
Able ?????? ??????? ?????? ??? First-tier Tribunal (Tax Chamber) ?? ????, ?? ??????? ??  
24?? ??????? 2009, ?????? ??? ?? ?????????? ?????????? ??? ??? ?????? ??? ? Able  
????????????? ??? ??? ???.

9 ?? Commissioners ?????? ??? ?????? ??? ?????? ??? ?????????? ?????????? ???  
????????? ???????????. ??? ??? ?????? ???, ?? ?????? 151, ?????????? 1, ??????? ??,  
??? ?????? ??? ??? ?????????? ??? ?????? ??? ?????? ?????????? ?????????? ???  
?????? ??? ?????????????? ??? ?????? ??? ?????????? ?????????? ??? ?????? ???  
????? ??? ?????? ??? ?????? ??? ?????? ???????, ??? ??? ??? ?????????? ??? ?? ???  
????? ?????? ??? ?????? ??? ?????????? ?????????? ?????? ?? ??? ??? ?????? ???  
????? ?????? ??? ?????? ?? ?????????? ?????????? ?????? ?? ??? ??? ?????? ???  
?????.

10 ??????? ??? ??? ??????? ??? ??????? ??? ??????? ??? ??????? ??? ??????? ?  
????????? ??? 151, ?????????? 1, ??????? ??, ??? ??????? ??? ??? ??? ??, ?? Upper  
Tribunal (Tax and Chancery Chamber) ?????????? ?? ?????????? ?? ?????????? ??? ??  
????????? ??? ?????????? ?? ?????????? ?????????? ??????????:

«????? ?? ?????? 151, ?????????? 1, ??????? ??, ??? [????????? ??? ??? ???] ??? ?????? ???  
????????? ??, ??? ?????? ??? ?????????? ?????????, ?????????? ?????????? ???  
????? ??? ?????????? ??? ?????? ??? ?????????? ?????????? ??? ?????????? ??? ?????????? ???  
United States Department of Transportation Maritime Administration ?? ??? ? ?? ?????????? ???  
????????? ??????????:

?) ??? ? ??????? ??? ??????? ?? ?????? ??? ?????? ??? ??????? ?????????? ??? ???  
????????? ??? ?????????? ?????? (????) ??? ??????? ??? ??? ?????? ???  
????? ??? ?? ??????? ??? ??????? ??? ??? ??? ???????,  
?) ??? ? ??????? ??? ??????? ?? ?????? ??? ?????? ??? ??????? ?????? ??? ??? ???  
????????? ??? ??????? ??? ??????? ??? ??????? ??? ??????? ??? ??? ??? ???

?????????? ??? ?? ??????????;»

??? ??? ?????????????? ??????????

11    ??? ??? ????? ?? ????? ?????? ??? ?????? ???????????, ??? ??? ?????? ?????? ???  
?????????? ?????????? ??? ??????? ??? ?????? ??? ?????? ??? ?????? 151, ?????????? 1, ??????????  
??, ??? ??????? ??? ??? ???.. ??????????????, ?? ?????? ??? ?????????? ?????? ??? ??????????  
??? ??????? ??? ??? ??? ?????? ??? ?????? ?????? ??????, ?????? ? ????? «????? ??  
????????? ?????? ?????????? ??? ?????? ?????? ?????? ?????», ?????????? ?????????????? ???  
????? ?????????????? ??? ?????? ?????? ?????? ??????, ??? ????? «[????????? ?????? ??? ???  
????? ?????????? ??? ?????? ?????? ??????] ??? ?????? ??? ?????? ??? ?????? ??? ??????????  
?????», ??? ??? ??? ?????? ??? ?? ?????? ????????. ? ?????? ??? ?????? ??? ?????? ??????  
????????? ???, ??? ?????? ?????? ??? ?? ??????, ??? ?????? ??? ?????? ??? ??? ??? ??????  
????????? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???.

12    ???????, ?????????? ??? ??? ??? ?????? ?????? ?????? ?????? ?? ?????????? ??????  
????????? ?????????? ??? ?? ??? ?????? ???????, ??? ?????? ???????, ?? ?????? ??? ???  
?????????. ??? ??? ?????? ??????, ? ?????? ??? ?????? ??? ?????? ?????? ??? ??????  
????? ?? ?????? ?????????? ?????? ??? ?? ?????? ??? ?????? 151, ??????????  
1, ??????? ?, ??? ?????? ??? ??? ??? ???.

13    ???????, ??? ?????? ??????????, ? ?????????? ??? ?????????????? ?? ??? ??? ??? ???  
????????? ?????????? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ??????? ??  
????????? ??? ??? ??? ?????? ??? ?????? ??? ??????, ??? ?????? ??? ?????? ??? ?????????? ???  
????????? ??? ??? ?????? ??? ?????? ?????????? ??? ??????. ??? ?????? ?????????? ??? ???  
????????? ??? ??? ?????? ??? ?????? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ??????  
?? ?????????? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????  
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????  
????? ??? ?????????? ?? ??? ?????? ?????? (??., ???, ?????? ??? 3?? ?????? 2011,  
C?41/09, ??????? ??? ??? ??? ?????, ?????? 2011, ?. ??831, ????? 44 ??? ???  
????????? ??????).

14    ??' ????, ?????? ?? ?????????? ??? ??? ?????? ?????????? ??? ??????????  
????????? ?????? ??? ?? ?????????? ??? ??? ???, ??? ?????? ?????????? ??? ?? ??? ???  
????????? 1, ??????? ?, ??? ?????? ??? ??? ???, ?????? ?? ?????????? ?????? ??????  
????????? ?????????? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????  
?? ?????????? ??? ?????????? ?????? ?????? ?????? ?????? ??? ?????? ??? ?????? ??? (?)  
?????????, ?????? ??? 22?? ?????????? 2010, C?116/10, Feltgen ??? Bacino Charter  
Company, ?????? 2010, ?. ??14187, ????? 19 ??? ??? ?????????? ??????).

15    ?? ??????????, ?????? ?????? ??? ?????? ?????? ??? ?????????? ??? ?????? 151,  
????????? 1, ??????? ?, ??? ?????? ??? ??? ??? ??? ?????? ??? ?????? ??? ?????????? ???  
?? ?????? ?????????? ??? ?????? ??? ?????? ?????? ??? ?????? ?? ?????? ??? ?????????? ???  
???? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ???  
????? ??? ?????? ???, ??? ?????? ??? ?????? ???, ??? ?????? ?????? ??? ?????? ??? ??????  
?????????

16    ???????????, ?? ?????? ?????? ??? ?????? ??? ?????? ???, ?? ?????????? ??? ?????? ??? ??  
????? ?????????? ??? ?????? ?????????? ??? ?????? ???, ?? ?????? ??? ?????? ??? ??  
????????????? ??? ??????, ??? ?????????? ??? ??? ?????? ??? ?????? ?????? ??? ??????  
?? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ??? ?????? ??? ?????? ?????? ??? ???  
?? ?????????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ???  
????????? ??? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???

????? ??????????? ??? ?????? ??? ??????????? ??? ?? ??????????????? ?????? ??? ??????????????? ?????? ??? ??  
????????? ??? ????? ?????????? ??? ?????? ?????????? ?????. ??? ?????? ?????????????? ?? ???  
?? ?????? ??? ?????? ?????????? ??? ?????????? ??? ?????? ?????????? ?? ??? 151,  
????????? 1, ?????????? ?, ??? ?????? ??? ?????? ??? ?????? ?????????? ?????????? ?????????.

17    ????????, ? ?? ??? ?????? ?????? ?? ?????????? ?? ?????????? ?????????????? ?????? ??? ??????  
?? ?????????? ?? ??? ?????? ?????? ?? ?????? ?????????? . ??? ??????, ?????? ?????? ??????  
????????? ??? ? ?????? ??? ?????????? ?????? ?????, ??? ?????????????? ?????? ???  
????????? ??????????????, ?? ?????????? ?? ?????????? ?? ?????????? ?? ?????? ??? ?????? ??? ??  
????????? ??? ?????????????? ?????? ?????? ?????? ?????? ??? ?????? ?????????? ??? ??  
????. ??????????????, ??? ?????????? ??? ?? ??? ?????? ?????? ?????????? , ? ?????? ???  
?? ?????????? ?????? ??? ?????? ?????? ?????? ?????????? ?????? ??? ?????? ?????????? ??? ??  
????? ??? ?????? ?????? ?????? ??? ?????? ?????? ?????????? ?????? ??? ?????? ?????????? ??? ??  
????????? ??? ?????? ?????? ??? ?????? ?????? ?????? ?????????? ?????? ??? ?????? ??????  
????????? ??? ?????? ?????? ?????? ??? ?????? ?????? ?????? ?????????? ??? ?? ?????? ???  
?? ??? ?????? ??? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ???  
????????? ??? ?? ??????. ?????? ??? ?????? ?????? ??? ?? ??? ?????? 151, ?????????? 1, ??????????  
??, ??? ?????? ??? ?????? ?????? ??????.

18    ????????, ? ?????? ??? ?????? ?????? ?? ?????????? ?? ?????????? ?????? ??? ?????? ?????????? ??? ??  
????? ?????? ??? ?????, ??? ?????????? ?? ?????????? ?????? ??? ?????????? , ?? ?????????? ???  
?? ?????? ??? ?? ?????? ?? ?????????? ?? ?????????? ?????? ?????????? ?????? ??? ??????  
????????? ??? ?????? ??? ?????. ??????, ??? ?????? ?????? ??? ?????? ??? ?????????? ??? ??  
????????? ??? ?????????? ?? ?????? ?????? ?? ?????????? ?? ?????????? ??? ?? ?????????? ???  
????? ?????? ??? 15 ?????? 151, ?????????? 1, ?????????? ?, ??? ?????? ??? ?? ?????? ???  
??? ??? ??? ?????????? ?? ?????? ?????? ?????? ?????? ?????? ?????????? ??? ?????? ??? ??  
????????? ??????.

19    ????????, ?? ??? VIII ??? ?????????? ??? ?? ?????? ?????????? ?????? ??? ??  
?????, ??? ?????????? ? ??????, ??? ?????? ?????????? ?????? ??? ?? ?????? ??? ??  
????????? ??? ?????? 151, ?????????? 1, ?????????? ?, ??? ?????? ??? ?? ?????? ??? ??  
????????? ??? ?????? ?????? ??? ?? ?????? ??? ?????? ?????? ?????? ??? ?????????? ??? ??  
?? ?????? ?????? «????? ?? ?????? ??? ?????? ?????? ?????? ??? ?????? ??? ??

20    ?? ??? 151, ?????????? 1, ????????, ??, ??? ?????? ??? ?? ??? ?????? ??? ??  
?? ?????????? ??? ?? ??? ?????? ??? ?? ?????? ?????? ?????????? , ??? ? ?????? ??? ??  
????? ????, ??? ?????????? ?????? ?????? ?????? ?????? ?????? ?????????? ??? ??  
????????? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ??? ??  
????????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ??? ??  
????????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ??? ??  
????????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ??? ??  
????????? ??? ?????? ?????? ?????? ??? ?????? ?????? ?????? ?????? ??? ??  
????????? ??? ?????? ?????? ?????? ??? ?????? ?????? ?????? ??? ??.

21    ??? ?????? ?? ?????? ?????? ??? ?????? ??? ?????????? ??? ?????? ??? ??  
????????????? ??? ?? ??? ?????? ??? ?????? 151, ?????????? 1, ?????????? ?, ???  
????????? ??? ?? ??? ?????? ?????? ??? ?? ?????? ?????? ?????? , ??? ? ?????? ??? ??  
??? ?????? ????, ??? ?????????? ?????? ?????? ?????? ?????? ?????? ??? ??  
??? ?????????? ?????? ?????? ?????? ?????? ?????? ?????? ??? ?? ?????? ?????? ??? ??  
????????? ??? ?? ??? ?????? ?????? ?????? ?????? ?????? ?????? ??? ?? ?????? ??? ??  
????????? ?? ?????? ?????? ?????? ?????? ?????? ?????? ??? ?? ?????? ??? ??  
????????? ??? ?????? ?????? ?????? ??? ?????? ?????? ??? ?? ?????? ??? ??

22    ??????, ??? ?????? ?????????? ??? ?????????? , ??? ?? ?????? ?????? ?????????? ???  
????????? ??? ?????? ?????? ?? ?????????? ?????? ??? ?????? ??? ?? ?????? ??? ??

?????? ???? ?????? ??? ????????????, ??? ????? ?? ?????? ??? ?????????????? ?? ??? ?????? ??????  
?????? (??., ????, ?????????????? ?????? Feltgen ??? Bacino Charter Company, ??? 12  
??? ??? ?????????????? ??????????).

23    ??? ?????? ?? ??????? ??? ?????? ??????????? ?? ?????? 151, ?????????? 1, ??????????  
??, ??? ??????? ??? ???, ?????? ?? ?????? ?????, ??? ?????????? ? ?????????? ???  
????????? ?????????? ??? ? ?????? ?????? ???????????, ? ?????????? 1, ?????????? ?, ??? ??????  
?????. ??? ? ?????? ??? ??? ?????? ?????? ?????????? ??? ?????? ???, ??? ??????  
?????????????, ??? ?????????? ??? ?????? ??? ?????? ?????????? ??? ?????? ??? ??????????????  
????? ??? ?????????? ??? ?????????????? ?????? ?????? ?????????? ??? ?????? ?????????????? ???  
??? ?????? ?????????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??????????, ? ??????  
?????? ??????????, ??? ??? ?????? ???????????, ??? ?????????? ?????? ??? ?????? ??? ??????  
????????? ??? ?????????????? ??? ?????????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ??????  
????????? ?????????? ?????????????? ??? ?? ?????? ?? ?????? ?????????? ??? ?????? ??????????  
??????, ??? ?????? ?? ?????? ??? ?????? ?????????? ??????.

24    ??? ??? ?????????? ??? ??? ?????? ?????????? ?????????? ???, ??? ?????????????? ???  
????? 17 ??? ?????????? ??????????, ? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?? ???  
????????? ?????????? ??? ??? ??? ?? ?????????? ?????? ??? ?? ?????? ??? ?????? ?????????? ???  
????????????? ??? ??? ?????? ?????????? ??? ?????? ?????? ?????? ?????? ?????? ??? ?? ??? ??????  
? ??????????.

25    ??????, ??? ?? ?????? ??? ?????? ??? ? ?????????? ??? ?????? ??? ?? ?????????? ???  
????????? ?????? ?????? ??? ?????? ?????? ??? ?????? ??? ?????????? ? ?????????? ??????????  
??? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ?????? ??? ? ?????? ??? ??????  
????????? ? ?????????? ?????????? ?? ?????? ?????? ?????? ?????? ??? ?????? ??? ?? ??????  
??? ?? ??? ??????.

26    ???????, ?? ?? ?????? 151, ?????????? 1, ?????????? ??, ??? ?????? ??? ?? ??? ??  
????????? ??? ??? ?????? ??? ?????????? ??? ??? ??? ??? ?????????? ?????? ??? ??  
????????? ?????????? ??? ?????????????? ??? ?????? ?????? ?????? ?????????? ??? ??  
????????????? ??? ?????? ??? ?????????? ??? ?????? ?????? ?????? ?????? ?????????? ???,  
????? ?????? ??? ?????? ???????, ?????? ??? ?? ?????? ?????? ?????? ?????? ?????????? ???  
????????? ??? ?????????? ??? ?????????? ??? ?????? ??? ?? ?????? ?????? ?????? ???????, ??? ??  
?? ??? ?????????? ??? ?????? ?? ??????????, ?? ?????? ??????, ?? ?????? ?????????? ??? ??  
??? ??? ??? ??? ?? ?????? ?? ?????????? ??? ?????? ?????? ?????? ?????? ?????? ???????, ??  
????? ?????????? ? ?????????? ?????????? ??? ?????? ??? ?????? ?????? ?????? ?????? ??????.  
??? ?????? ?????????? ??? ?????? ?????? ??????????, ???, ?? ?????? ??? ?????? ??? ?????? ??? ??  
????????? ??? ?????????? ??? ?????? ??????, ??? ?????? ?????????????? ?? ?? ?????? 24 ??? ??????  
?????????.

27    ???????, ?????????? ??? ?????? ??? ?????? ??? ?????? ?????? ??? ?? ??????????  
????????? ??? ?????? ??? ?????? ??? ??, ??? ??? ?????? ??? ?????? ??? ??  
14 ??? ?????? ??? ??????????, ?? ?????? 151, ?????????? 1, ?????????? ??, ??? ?????? ??? ??  
??? ?????? ?? ?????????? ??? ??? ?????? ??? ?????? ?????? ?????? ??? ??  
????? ??????, ??? ?????????? ??? ?????? ??? ?????? ?????? ?????? ?????? ??? ??????????????  
????? ?????? ??? ?????? ?????? ??? ?????? ?????? ?????? ?????? ??? ?????? ?????? ??? ??  
??? ?????? ?????? ?????? ?????? ??????, ?????? ?????? ??? ?????? ?????? ?????? ??? ??  
????????? ?????? ?????? ?????? ?????? ?????? ??? ?????? ?????? ??? ?????? ??? ??  
????????? ??? ?????? ?????? ?????? ??? ?????? ?????? ?????? ??? ?????? ??? ??.

28    ??? ?? ?????????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ??  
????????? ??? ?????????? ???, ?????????? ??? ??? ?????? ??? ?????? ??? ??

? ?????? ??????????? ???? , ?? ??????????? ?? ?????????? ??? ?? ?????????? ?????? ?  
????? ?? ? ???? ???? ?? ?????????? ??? ?????? ?????? ?????? ?????? ?????? ??? ?????? ???  
????.

29    ?????????? , ??? ? ???? VIII ??? ?????????? ??? ?? ?????? ?????????? ?????? ?  
????????? ?????? ??? ? ? ???? ?????? , ??? ?????? ??? ?????????? ?????? ??? ???? ???? ?  
????? ???? ?????????? ??? ?????? , ??? ?????? , ??? ?????????? ?????? ??? ???? ???? ?  
????????? ?????? ?????? ?????????? ??? ?????? ?????? ?????? ?? ?????? ?????? ??? ???? ?  
????????? ?????? , ?????? ?? ?????? ??? ?????? ?????? ?????? ??? ?????? ?????? ?  
????????? ?????? ??? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? .

30    ??? ?????? , ??? ?????????? ?????? ?????? ?? ?????? ? ?????? ? ?????? ???? ? ???? ?  
151, ?????????? 1, ?????? ?? , ??? ?????? ??? ???? ???? ???? ???? ???? ???? ???? ???? ?  
????????? , ??? ? ???? ?????? ??? ?????? ??? ?????? ?????? , ??? ?????????????? ?????? ?  
????? ???? ?????? ?????????? ??? ?????????? ?????? ?????? ?????? ??? ?????????? ??? ???? ?  
????? ???? ?????? ??? ?????????? ?????? ?????? ?????? ?????? , ?????? ?????? ??? ???? ?  
????????? , ?????????? ??? ???? ???? ?????? ??? ?????? ?????? ?????? ?????? ?????? .

–    ? ?? ??? ?????? ?????????? ?????? ??? ?????? ??? ?????? ?????? ?????? ?????? ??? ???? ?  
????? ? ???? ?????? ?????????? ??? ?????? ?????? ?????? ?????? ??? ? ???? ???? ???? ?  
????? ???? , ???

–    ? ??? ??? ?????? ?????? ?????????? ??? ?????? ??? ?????? ??? ???? ???? ???? ???? ?  
????? ?????????? ? ?????????? ?????? ??? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?  
??? ? ???? ?????? ?????????? ??? ???? ?????? .

??? ??? ?????????? ????

31    ?????????? ??? ? ?????? ?????????? ??? ?? ?????? ??? ?????? ?????????? ??? ???? ?  
??? ?????????? ?????????????? ??? ?????? ?????? ?????? ?????? ?????????? , ?' ????  
????????? ?? ?????????? ??? ?????? ?????? ?????? ?????? . ?? ?????? ??? ?????? ??????????  
????? ?????? ?????????? ??? ?????? , ??? ?????? ??? ???? ???? ???? ???? .

??? ??? ?????? ?????? , ?? ?????????? (????? ????) ??????????:

? ???? 151, ?????????? 1, ?????? ?? , ??? ?????? 2006/112/? ???? ???? ???? ,  
?? 28? ?????? 2006, ?????? ?? ? ???? ?????? ?????? ?????? ?????? ?????????? ??????  
????? ??? ?????? ??? ???? ?????? ?????? , ??? ? ?????? ??? ?????? ?????? ?????? ?  
????? ???? , ??? ?????????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ???  
????????? ?????? ?????? ??? ?????? ?????? ?????? , ?????? ?????? ?????? ??? ???? ???? ?  
????????? ?????? ??? ?????? ?????? , ?????? ?????? ?????? ??? ???? ???? ???? .

–    ? ?? ??? ?????? ?????? ?????????? ??? ?????? ??? ?????? ??? ?????? ?????? ?????? ??? ?  
????? ?????? ?????? ?? ?????? ?????????? ??? ?????? ?????? ?????? ?????? ?????? ??? ?  
????????? ?????? ??? ???? ?????? .

–    ? ??? ??? ?????? ?????? ?????????? ??? ?????? ??? ?????? ??? ? ???? ???? ???? ?  
?? ?????? ?????? ?????? ?????? ?????? ?????? ??? ?????? ?????? ??? ?????? ?????? ?  
????? ???? ??? ???? ?????? ?????? .

(?????????)

\* ?????? ??????????: ? ??????.